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Attorneys for Mr. Navarro-Flores

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE JANNIS L. SAMMARTINO)

UNITED STATES OF AMERICA,	)	CASE NO. 07CR3178
	)	
Plaintiff,	)	DATE: February 1, 2008
	)	TIME: 9:00 A.M.
v.	)	
	)	NOTICE OF MOTIONS AND
GONZALO NAVARRO-FLORES,	)	MOTIONS TO:
	)	
Defendant.	)	1) COMPEL DISCOVERY; AND
	)	2) <u>LEAVE TO FILE FURTHER MOTIONS.</u>

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND  
CARLA J. BRESSLER, ASSISTANT UNITED STATES ATTORNEY:

**PLEASE TAKE NOTICE** that, on February 1, 2008, at 9:00 a.m., or as soon thereafter as counsel may be heard, the defendant, Gonzalo Navarro-Flores, by and through his counsel, Michelle Betancourt and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions listed below.

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**MOTIONS**

Gonzalo Navarro-Flores, the defendant in this case, by and through his attorneys, Michelle Betancourt, and Federal Defenders of San Diego, Inc., pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, Fed. R. Crim. P. 12, 16 and 26, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- 1) Compel discovery; and
- 2) Grant leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

Dated: January 11, 2008

s/ Michelle Betancourt  
**MICHELLE BETANCOURT**  
Federal Defenders of San Diego, Inc.  
Attorneys for Mr. Gonzalo Navarro-Flores